

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHER DISTRICT OF ILLINOIS, EASTERN DIVISION**

VAL POPESCU,

Plaintiff,

v.

4ACCESS COMMUNICATIONS COMPANY,
a Delaware Corporation, and DOES 1-10,
Inclusive,

Defendants

No. 1:08 C 3406

**MOTION FOR EXTENSION OF TIME TO FILE
PLEADING RESPONSIVE TO PLAINTIFF’S COMPLAINT**

Defendant 4Access Communications Company (“4Access”), by its attorney, Jeffrey D. Corso of Cooney & Corso, LLC, moves for an extension of time to file a pleading responsive to Plaintiff’s Complaint, and states:

1. On January 9, 2008, Val Popescu (“Plaintiff”) filed a complaint in the Superior Court for the State of California, County of San Diego, under case number 37-2008-00075299-CU-WT-CTL (the “Complaint”) and named 4Access as the Defendant.
2. 4Access was served on February 21, 2008.
3. On March 20, 2008, 4Access filed a timely notice of removal of the Complaint in the United States District Court for the Southern District of California, case number 08 CV 525 (the “California United States District Court”).
4. On April 8, 2008 and with leave of Court, Plaintiff filed his First Amended Complaint.

5. On April 25, 2008, 4Access timely filed its Motion to Dismiss for Improper Venue. Plaintiff filed papers in opposition to the motion. Oral argument on the motion occurred on June 6, 2008.

6. On June 11, 2008, the California United States District Court denied 4Access' motion to dismiss but transferred the entire matter to this Court.

7. On June 12, 2008, the Clerk of the California United States District Court transferred the entire original file (excepting the June 11, 2008 order) to the Clerk of this Court.

8. This matter is scheduled for case management on August 13, 2008.

9. 4Access has retained counsel to defend Plaintiff's lawsuit. Counsel needs additional time to review the allegations with Defendant and the pleadings and papers filed prior to transfer of the matter to this Court.

10. In view of the foregoing, Defendant requests until July 28, 2008 to file its pleading responsive to Plaintiff's complaint.

For these reasons, Defendant prays that this court grant its motion for extension of time to July 28, 2008 to file its pleading responsive to Plaintiff's complaint, and for further relief which this court deems just.

Respectfully submitted,

4ACCESS COMMUNICATIONS COMPANY

By: /s/ Jeff Corso
One of Its Attorneys

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